



MISSOURI ETHICS COMMISSION

PO Box 1370

Jefferson City, MO 65102

www.mec.mo.gov

(573) 751-2020 / (800) 392-8660

James Klahr

Executive Director

November 4, 2016

Thomas Schneider, Mayor
City of Florissant
955 Rue Saint Francois Street
Florissant MO 63031

Re: File No. 16-0073-I

Dear Mr. Schneider:

The Missouri Ethics Commission considered the complaint filed against you at its November 2, 2016 meeting. The Commission reviewed the allegation that you violated conflict of interest laws by taking campaign contributions from businesses under contract with the city.

Staff review of the complaint determined that in January 2015, your candidate committee, Friends of Mayor Schneider, filed its January Quarterly Report with the St. Louis County Board of Elections. The committee also filed a Contractual Relationship Report as part of the January Quarterly Report. Pursuant to Section 130.041.1(3)(a), RSMo, this report reflects those contributions received from a person who has a contractual relationship with the city:

(3) Receipts for the period, including:

(a) Total amount of all monetary contributions received which can be identified in the committee's records by name and address of each contributor. In addition, the candidate committee shall make a reasonable effort to obtain and report the employer, or occupation if self-employed or notation of retirement, of each person from whom the committee received one or more contributions which in the aggregate total in excess of one hundred dollars and shall make a reasonable effort to obtain and report a description of any contractual relationship over five hundred dollars between the contributor and the state if the candidate is seeking election to a state office or between the contributor and any political subdivision of the state if the candidate is seeking election to another political subdivision of the state;

Friends of Mayor Schneider filed subsequent Contractual Relationship Reports with the St. Louis County Board of Elections, including one on March 31, 2016 as part of its April Quarterly Report.

Staff determined that, under the Florissant City Charter, the mayor has the executive and administrative power of the city and the council is vested with all legislative authority. The charter further provides that the mayor shall appoint a purchasing officer who is responsible for securing all contractual or personal services other than contracts for public improvements and those professional services which are in their nature unique and not subject to competitive bidding (Florissant City Charter, Chapter C, Article VI, Section 6.3).



MISSOURI ETHICS COMMISSION

P.O. Box 1254

Jefferson City, MO 65102

www.mec.mo.gov

(573) 751-2020 / (800) 392-8660

James Klahr

Executive Director

You indicated that the companies who are contracted with the city and also contributed to your candidate committee have had contracts with the city since before you assumed the office of mayor. Per the city charter, certain professional services which are more specialized do not require bidding and the mayor has authority to contract for those services. You also indicated that you have no association or financial interest in the companies that contributed to Friends of Mayor Schneider and no evidence was found to the contrary. Finally, you indicated that you did not offer to accept contributions or anything of value to approve or renew contracts with the city, and again, no evidence was found to the contrary. Based on the facts presented, your actions did not trigger any conflict of interest under Sections 105.452, RSMo or 105.458, RSMo.

From the facts presented, the Commission finds no reasonable grounds exist to support a violation of Chapter 105, RSMo, and is dismissing the complaint.

Sincerely,

A handwritten signature in cursive script, reading "James Klahr", is positioned above the printed name.

James Klahr

Executive Director